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ATTORNEYS FOR VERTICAL BRIDGE REIT, LLC

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION**

IN RE:

HIGH PLAINS RADIO NETWORK,
LLC,

Debtor.

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CASE NO.: 24-70089 (SWE)

A Hearing on the Motion of Creditor Vertical Bridge for Entry of an Order (I) Granting Vertical Bridge Relief from the Automatic Stay, or (II) Alternatively, Granting (A) Adequate Protection to Vertical Bridge with Immediate Payment of Its Administrative Claim for Post-Petition Rent and (B) Compelling Immediate Assumption or Rejection of Unexpired Leases of Nonresidential Real Property

NOTICE OF HEARING

TO ALL PARTIES IN INTEREST:

This is to inform you that a hearing on the above-referenced Motion has been set for hearing on **MAY 23, 2024, AT 9:00 A.M.**, before the Honorable Scott W. Everett.

The hearing will be conducted via WebEx. The WebEx hearing instructions for the Court are shown below.

For WebEx Video Participation/Attendance:	https://us-courts.webex.com/meet/everett
For WebEx Telephonic Participation/Attendance:	Dial-In: 1-650-479-3207 Access code: 476 420 189

DATED APRIL 30, 2024

Respectfully submitted,

K&L GATES LLP

/s/ David Weitman

David Weitman

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Attorneys for Vertical Bridge REIT, LLC

NOTICE

PURSUANT TO LOCAL BANKRUPTCY RULE 4001-1(b), A RESPONSE IS REQUIRED TO THIS MOTION, OR THE ALLEGATIONS IN THE MOTION MAY BE DEEMED ADMITTED, AND AN ORDER GRANTING THE RELIEF SOUGHT MAY BE ENTERED BY DEFAULT.

ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT EARLE CABELL FEDERAL BUILDING, 1100 COMMERCE ST., ROOM 1254, DALLAS, TX 75242-1496 BEFORE CLOSE OF BUSINESS ON MAY 14, 2024, WHICH IS AT LEAST 14 DAYS FROM THE DATE OF SERVICE HEREOF. A COPY SHALL BE SERVED UPON COUNSEL FOR THE MOVING PARTY AND ANY TRUSTEE OR EXAMINER APPOINTED IN THE CASE. ANY RESPONSE SHALL INCLUDE A DETAILED AND COMPREHENSIVE STATEMENT AS TO HOW THE MOVANT CAN BE “ADEQUATELY PROTECTED” IF THE STAY IS TO BE CONTINUED.

CERTIFICATE OF SERVICE

The undersigned certifies that on April 30, 2024, a true and correct copy of this Notice of Hearing was served via ECF. The parties set forth below, the 20 largest unsecured creditors, and those parties who have filed notices of appearance and requests for notices were served with this Notice of Hearing by First Class United States Mail:

High Plains Radio Network, LLC
c/o Monte Lee Spearman, Member
P.O. Box 1419
Vernon, Texas 76384

United States Trustee
1100 Commerce St., Room 976
Dallas, Texas 75242

U.S. Small Business Administration
10737 Gateway West, Ste. 300
El Paso, Texas 79935

Debtor's Counsel
c/o Jeffery D. Carruth
Weycer Kaplan Pulaski & Zuber, P.C.
Dallas, Texas 75204-2514

Subchapter V Trustee
c/o Scott M. Seidel
6505 West Park Blvd., Suite 306
Plano, Texas 75093

/s/ David Weitman
David Weitman